

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, CHRISTOPHER)	CIVIL NO. 03-00567 JMS/BMK
GAHR, FRANK ROBERT PAULSON,)	
CHARLES TURNER, and TOM)	
YOUNG,)	
)	AFFIDAVIT OF G. TODD WITHY
Plaintiffs,)	
)	
v.)	
)	
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY)	
)	
Defendants.)	
_____)	

AFFIDAVIT OF G. TODD WITHY

STATE OF HAWAII)	
)	SS.
CITY AND COUNTY OF HONOLULU)	

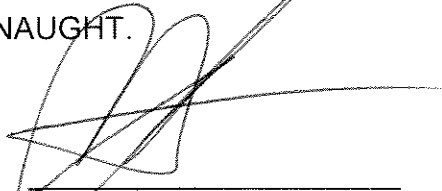
I, G. TODD WITHY, after being duly sworn on oath, deposes and states that:

1. I am an attorney licensed to practice law in the State of Hawaii, and I am making a special appearance as an attorney for Plaintiff CHRISTOPHER GAHR, in this action.
2. I am an active member in good standing of the Bar of the State of Hawaii.
3. That if this motion is granted as requested I will, at all times, participate in the preparation and trial of this action with authority and responsibility to act as one of the attorneys of record for all purposes.

4. That I consent to the designation made herein by counsel applying for appearance *pro hac vice*.

5. That my office address and telephone number is G. Todd Withy, 888 Mililani Street, Suite 700, Honolulu, Hawaii 96813, (808) 521-2500.

FURTHER AFFIANT SAYETH NAUGHT.

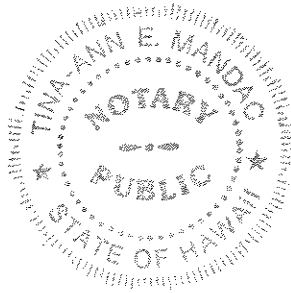


G. TODD WITHY

Subscribed and sworn to before me
this 25 day of January, 2007.



NOTARY PUBLIC, STATE OF HAWAII
Tina Ann E. Mandac



My Commission expires on: August 3, 2010